

**THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

NEW REFLECTIONS PLASTIC	-----X	
SURGERY, LLC)	
)	
Plaintiff/ Counterclaim-Defendant,)	Civil Action No. 16-08523-FLW-TJB
)	
-against-)	JURY TRIAL DEMANDED
)	
REFLECTIONS CENTER FOR SKIN)	
AND BODY, PC,)	
)	
Defendant/Counterclaim-Plaintiff.)	
	-----X	

PROPOSED SCHEDULING ORDER

1. A conference was held before the Court on **January 18, 2017 at 3:30 p.m.**
2. The parties will make mandatory disclosures by **May 5, 2017.**
3. Any motion to amend the pleadings must be filed no later than **May 27, 2017** and are returnable **June 10, 2017.**
4. Any motion to join new parties, whether by amended or third-party complaint, must be filed no later than **May 27, 2017** and are returnable **June 10, 2017.**
5. In accordance with Fed.R.Civ.P. 30, the amount of depositions and interrogatories to be taken by each party shall be limited to **ten** depositions per side, except upon leave of Court. In accordance with Fed.R.Civ. P. 33, the parties shall be limited to **twenty-five** interrogatories, (including all subparts), per party, except upon leave of Court.
6. Fact discovery shall be completed no later than **August 25, 2017.**
7. Expert reports of parties with the burden of proof are due on or before **September 22, 2017.**
8. Rebuttal expert reports are due on or before **November 3, 2017.**
9. Expert depositions may be conducted as late as **December 8, 2017.**
10. Dispositive motions are to be filed by **February 6, 2018.**
11. A settlement conference will be scheduled on **a date to be later set by the Court.**

12. The parties stipulate to service of discovery by email.

13. The parties agree to exchange at least some ESI in discovery, the particular framework for production will be agreed upon by the parties after some initial discovery in this case.

14. The parties intend to submit a mutually acceptable protective order for the exchange of confidential information for entry by the Court.

Date: April 27, 2017

*15. Plaintiff shall
initiate a telephone conference
on August 3, 2017 at
3:30 pm*

*So ordered
J. Bong
4/30/17*

By: /s/ Dariush Keyhani
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